

August 31, 2006

Valerie Frances, Executive Director,  
National Organic Standards Board (NOSB)  
USDA-AMS-TM-NOP  
Room 4008-South Building  
1400 Independence Ave, SW  
Washington, DC 20250-0001

Re: Pet Food Task Force Report  
Submitted via email to: NOSB.Processing@usda.gov

Dear Valerie:

I am writing on behalf of Natural Pet Nutrition to support the interim report of the pet food task force, submitted April 7, 2006 to the National Organic Standards Board.

This task force effectively addressed four critical areas:

- Reconciling the regulatory differences contained in the USDA National Organic Standards, and the American Association of Feed Control Officials Handbook;
- Upholding consumer confidence by recommending labeling categories consistent with the USDA Organic Standards for human food;
- Establishing a proposed framework within §205.603 and §205.605 to include micronutrients essential to pet health; and
- Creating a proposed framework within §205.237 that recognizes the dietary needs of pets, as opposed to livestock and poultry.

In addition, we support the task force's recommendation to prohibit the use of organic and non-organic form of the same ingredient in the same product.

As per the request for commenters to assess the task force's report in addressing six specific criteria, I offer the following:

1. Do the recommended standards communicate effectively?

Yes, the recommendations clearly communicate the goals of establishing regulations that would regulate ingredients in a manner compatible with livestock feed, but would regulate product labeling in accordance with human food products.

2. Provide clear and adequate context of scope, product coverage, and production systems?

Yes, the recommendations delineate the nutritional differences between pets and livestock.

3. Identify and address key stakeholders and their concerns and challenges?

Yes, to a degree. The task force wisely focused upon maintaining the integrity of organic standards, rather than simply placating any specific stakeholder group. At the same time, the recommendations developed by the task force should be attainable for any entity wishing to produce and market pet food products labeled as organic or made with organic ingredients.

4. Include vision and strategy for achieving consistency with organic principles demonstrated in the Organic Foods Production Act of 1990 and its implementing regulations?

Yes, the recommendations are consistent with OFPA and the Final Rule.

5. Present measurable objectives that are enforceable?

Yes, the specific changes recommended by the task force should be readily enforceable.

6. Present a clear expectation of targets and goals?

Yes, the task force established a clear goal that balances organic integrity with the nutritional needs of pets.

We encourage adoption of the task force recommendations, and urge that NOP begin rulemaking process to implement the recommendations of this report.

Sincerely,



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